STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF LIBRARIES

November 4, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Modernizing the E-rate Program for Schools and Libraries WC Docket No. 13-184**

Dear Secretary Dortch:

The E-rate Program provides critical support for digital learning and public access to online information through America's libraries. For this reason, the Oklahoma Department of Libraries supports the comments of the American Library Association (ALA) on Modernizing the E-rate Program for Schools and Libraries. As our most important priority, we ask the Federal Communications Commission (FCC) to move quickly to increase E-rate funding to jumpstart and sustain high-capacity broadband connections in our libraries and schools so that we may meet the pressing information and learning demands of our communities.

The Oklahoma Department of Libraries is a division of the State of Oklahoma. Our agency supports the 207 public libraries in Oklahoma to support education and lifelong learning, economic development, and community development in every county of the state. In addition to providing funding for early literacy, the Summer Reading Program, and homework help, the staff of the Oklahoma Department of Libraries assists public libraries in filing for both state and federal e-rate programs to ensure that the residents of Oklahoma have access to current information and the ability to interact with all levels of government services.   Over 97% of the public libraries in Oklahoma receive both federal and state e-rate funding and we are among the top ten states in terms of broadband availability at public libraries. We recently completed a BTOP Public Computing Center grant that increased broadband connections and provided videoconferencing equipment at 44 public libraries.

America's 16,417 public libraries serve more than 77 million computer users each year, yet only half of these multi-user outlets offer internet speeds above the FCC's *home* broadband recommendation of 4 Mbps. Through these internet connections, libraries support the education, employment and e-government resources and services all increasingly moving to "the cloud" and often *only* available in an online environment.

In a recent Pew Internet Project survey, 70 percent of parents reported their child visited a public library in the past 12 months. Of these, 77 percent of children ages 12-17 went to the library to

do school work; this is true of a majority of *all* children. Together schools and libraries ensure learners have access to technology-enabled and personalized educational opportunities during the school day—and beyond. We know learning doesn't end when the last school bell rings. The Oklahoma Department of Libraries supports learning achievement by Oklahoma students through statewide licensing of electronic resources to provide full text educational materials to all schools, public and private, throughout the state. For most of our schools, the materials budget is quite small and often is $1,000 or less. These statewide databases (including Encyclopedia Britannica) are often the only content available online in these school districts. E-rate is the engine that drives many of these services that foster critical thinking, collaboration, and innovation among our students.

Libraries also serve non-traditional students—whether home-schooled, pursuing their General Equivalency Degree, participating in distance learning, or gaining new technology skills to advance work readiness. Libraries are uniquely situated to support 21st century education and lifelong learning because they provide internet access to *all* residents in the communities they serve. In fact, sixty-two percent of libraries nationwide report offering the only no-fee computer

E-rate has provided crucial financial support for connecting our libraries and communities to a wealth of internet-enabled resources and services. But to ensure our students have the edge they will need to compete in today's and tomorrow's global economy, our libraries and schools must move from basic—often inadequate connectivity—to 21st century broadband. Thus the Oklahoma Department of Libraries supports the Commission's first goal of the E-rate program to focus on high-capacity and affordable broadband connectivity.

If we are to meet the challenge of connecting our nation's students and learners to high-capacity broadband in the next five years as proposed by President Obama in June, we need to use the E-rate authority to quickly allocate additional temporary funding to support the deployment of "future-proof" fiber broadband capacity to libraries and schools. The "ConnectUS" proposal laid out by the ALA would address one-time deployment costs to establish the state-of-the-art networks needed to bolster bandwidth at affordable costs for many years into the future. Additionally, the Faster Internet Networks for All Libraries (FINAL) program would incent low-bandwidth libraries to take advantage of existing high-capacity broadband and thus "fast track" innovative services to their communities.[1] The Oklahoma Department of Libraries supports both of these proposals to catalyze needed broadband improvements. Less than 10 percent of public libraries currently offer their communities' internet speeds of 100 Mbps or higher. We must do better, and we can't afford to wait.

At the same time it is also important to streamline the program so that it is more accessible to all libraries and thus may benefit more communities. Even with the support of our state library e-rate coordinators, program complexity is the top reason libraries choose not to participate in the program. We cannot afford to leave these libraries behind and thus implore the Commission to implement the E-rate streamlining suggestions outlined in ALA's comments.

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[1] For more information relating to ALA's initial comments on these two proposals, please see their comments filed on September 16, 2013, pp. 20-23.

To support these E-rate goals, we support the initial comments filed by the ALA, and we want to focus particular attention to the following recommendations:

Ensure Affordable Access to 21st Century Broadband
- Increase E-rate funding to jumpstart and sustain high-capacity broadband connections that support digital learning and economic development through libraries and schools. The current cap on the program consistently falls far short of meeting demand. To address this we support a two-pronged approach: 1). New temporary funding to support the build-out of high-capacity broadband networks and provide increased support for libraries with the lowest levels of broadband capacity. 2). A permanent increase in the funding cap is needed and justified to address the ongoing costs of sustaining increased broadband connectivity.
- Provide additional E-rate discounts for remote rural libraries that often confront the greatest broadband costs and availability challenges.
- In cooperation with the library community, the FCC should develop scalable bandwidth targets and benchmarks for measuring progress against these goals. ALA recommends looking to newly developed public access technology benchmarks[2] and the National Broadband Plan[3] to inform these targets for libraries. We also suggest FCC targets must allow for significant local differences, including community size and current broadband options. We oppose rigid mandates or burdensome metrics.
- Lower barriers to deployment of dark and lit fiber and ownership of wide area networks when they are shown to be the most cost-effective ways to deliver high-capacity broadband to libraries and schools. Libraries and schools should be able to determine the most cost-effective technology solution within reasonable return on investment (ROI) timeframes.
- Enforce the Commission's Lowest Corresponding Price (LCP) rule. For example, a LCP review should be generated whenever a provider's bid for broadband services is above a certain threshold.

Streamline Administration of the E-rate Program
- Speed the application review process. One of the most frustrating aspects of the E-rate program is that many applicants are not notified by the Universal Service Administrative Company (USAC) that they have been funded (or not) by the July 1 start of the funding year. As mentioned earlier the Oklahoma Department of Libraries received a BTOP Public Computing Center grant that had a three year funding period. We filed a consortial application for federal e-rate which was not reviewed for 18 months. We could not get USAC PIA attention until we involved our Congressional delegation. This was something we did with great reluctance since it does not reflect well on the federal e-rate program but we were desperate. We were about to lose our once in a lifetime opportunity provided by the grant to significantly increase broadband speeds at non-metropolitan libraries in our grant but without approval of the federal e-rate funding, we could not meet the grant deadlines. Our telecommunications providers refused to

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[2] Edge benchmarks available at http://www.libraryedge.org/benchmarksv1. Benchmark 9.2 recommends that each public Internet user is allocated at least 500 Kbps upload and 1 Mbps download of network bandwidth capacity.
[3] The National Broadband Plan, developed by the FCC, is available at http://www.broadband.gov/plan/.
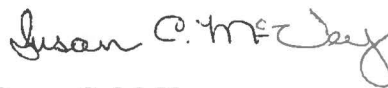
proceed without confirmation of the funding. It is critical that the application review process be shortened.

- Replace E-rate program procurement rules with those of the applicable locality or state. The E-rate program is extremely proscriptive when it comes to procurement policies, which is unnecessary because libraries already have procurement rules for a host of other goods and services they purchase. If the Commission does not want to defer to state or local procurement rules, we suggest it set a $5,000 *de minimus* funding request for exemption.
- Allow applicants to receive their E-rate funds directly from USAC. Eliminating providers serving as a funding "middle man" will streamline the process and be beneficial to both applicants and providers.
- Allow applicants to file an "evergreen" Form 471 for multi-year contracts.

As the Commission considers cost-effectiveness and how to best focus the E-rate program on high-capacity broadband, we urge you to phase in any changes in currently eligible services. Many of our libraries—particularly those with the leanest of budgets—rely on services that are now E-rate eligible, like Plain Old Telephone Service (POTS). The Commission should phase-out the elimination of any E-rate eligible services over a sufficient time to enable libraries to adjust their budgets to pay the full cost of any eliminated services.

Our nation's libraries represent an investment in lifelong learning and Internet access for all—especially for the roughly 30 percent of Americans who lack home broadband access. The E-rate Program is the engine powering much of our work to ensure no one is excluded from digital opportunity. The Oklahoma Department of Libraries and libraries across our state look forward to continue helping fulfill our nation's Universal Service goals through a future-focused and robust E-rate 2.0. Thank you for the opportunity to comment and for your consideration of our recommendations.

Sincerely,

Susan C. McVey
Director